



June 30, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW, Washington, DC 20554

Re: MB Docket No. 15-146
ET Docket No. 14-165
GN Docket No. 12-268

Dear Chairman Pai, Commissioner Clyburn, and Commissioner O'Rielly:

Access to affordable, high-speed internet is all but a necessity in the information age. Unfortunately, millions of Americans located primarily in rural areas of the country are decades behind when it comes to internet access. Thankfully, there is a bipartisan consensus on the need to close the "digital divide" that separates America's urban and rural inhabitants.

The good news is that private innovation is ready and willing to take up the challenge. In fact, perhaps the best solution—the use of TV white space—has been understood for a decade. What is needed is for government to clear the way and allow the market to innovate.

The unused radio frequencies between TV channels provide tremendous promise because they can carry large amounts of data for long distances. Making use of TV white space also doesn't require costly new infrastructure investments.

Unfortunately, government licensing requirements stand in the way of expanding the use of white space to bring high-speed internet access to rural America. The FCC has already begun the process of reevaluating the rules and regulations governing use of TV white spaces by partial deregulation in 2010 and 2015, expanding unlicensed use.

When the commission meets in July, it should finish this process by preserving three 6MHz white space channels in every market for use by the private sector to supply broadband to undeserved regions, thus finally unleashing the power of commercial innovation to tackle America's digital divide. To do this, the FCC should finalize its pending proposal to preserve one already vacant TV channel in the TV band in each market and finalize the other white space rulemakings.

While the FCC understandably must balance protection of existing licensed users from interference, this can still be accomplished while permitting for-profit access to white spaces. Doing so will allow market innovation to bring affordable, high-speed internet access to all Americans.

Sincerely,

Andrew F. Quinlan
President